

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division
In Admiralty**

In the Matter of COEYMANS MARINE TOWING, LLC D/B/A CARVER MARINE TOWING as Owner and Operator of M/T Mackenzie Rose, (IMO No. 8968765) her cargo, engines, boilers, tackle, equipment, apparel, and appurtenances, etc., *in rem*, ("M/T MACKENZIE ROSE"), petitioning for Exoneration from or Limitation of Liability in allision with Belt Line Main Line Railroad Bridge (the "Bridge") occurring June 15, 2024 in and about the Elizabeth River, Virginia.

Civil Action No: 2:24-cv-00490

REQUEST FOR ORAL ARGUMENT

Petitioner, Coeymans Marine Towing, LLC d/b/a Carver Marine Towing ("Carver"), by counsel, pursuant to Local Civil Rule 7(E), request oral argument on the following pending motions: 1) Petitioner's Motion for Protective Order (ECF Doc 71); 2) NPBL & Evanston's Joint Motion to Compel Inspection of the M/T Mackenzie Rose and for Sanctions (ECF Doc 67); and 3) NPBL & Evanston's Motion for Relief Under Rules 30 and 37 (ECF Doc 69).

Petitioner, Coeymans Marine Towing, LLC d/b/a Carver Marine Towing ("Carver") request an expedited hearing date for these motions. The issues set forth in the Motions have been fully briefed by the parties.

Dated: August 12, 2025

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CERTIFICATE OF SERVICE

I hereby certify that on August 12, 2025, a true and correct copy of the foregoing document was filed using the Court's CM/ECF system, which will serve all counsel of record by electronic mail as follows:

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